

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

MAVERICK RECORDING COMPANY, a California joint venture; ARISTA RECORDS, INC., a Delaware corporation; UMG RECORDINGS, INC., a Delaware corporation; WARNER BROS. RECORDS INC., a Delaware corporation; ATLANTIC RECORDING CORPORATION, a Delaware corporation; and BMG MUSIC, a New York general partnership,)	CIVIL ACTION No. 04-40167-FDS
)	
)	
)	The Hon. F. Dennis Saylor
)	
)	
)	
Plaintiffs,)	
)	
v.)	
)	
LISA HAGERTY,)	
)	
Defendant.)	

**DECLARATION OF COLIN J. ZICK IN SUPPORT OF
PLAINTIFFS' MOTION FOR ENTRY OF DEFAULT JUDGMENT BY THE COURT
AGAINST LISA HAGERTY**

I, COLIN J. ZICK, declare:

1. I am an attorney at law licensed to practice before the Courts of the Commonwealth of Massachusetts and this United States District Court. I am one of the attorneys for Plaintiffs in the above-captioned matter. Unless otherwise stated, I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.

2. On August 25, 2004, Plaintiffs filed the Complaint.

3. On December 22, 2004, the Clerk of this Court entered the default of Defendant.

4. Defendant has not appeared in this action. Additionally, before Plaintiffs sought entry of Default, Plaintiffs sent two letters to Defendant warning that Plaintiffs would seek a default judgment if Defendant did not respond to the Complaint. Attached hereto as Exhibit 1 are true and correct copies of those two letters.

5. I am informed and believe that Defendant is not an infant or incompetent person and, after consulting available public databases, is not in the military service.

6. Plaintiffs have incurred costs in this case in the amount of \$204.20.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 21st day of January 2005, at Boston.

/s/ Colin J. Zick
COLIN J. ZICK